

Comment #	Public Comments	USCIS Response
<p><b>Comment 1.</b></p>	<p><b>Commenter: Erin Hillis (received May 1, 2018)</b></p> <p>Dear DHS Officials: Regarding the “bridge application” / Form I-539 – I submit the following comments for your consideration:</p> <p>The “bridge application” is a problematic piece of immigration bureaucracy which serves little purpose for the applicants, but instead benefits USCIS. Please consider a revision of the Form I-539. This difficult-to-understand (and entirely too pricey) policy should either be removed, or, at least, should be rewritten in the Form Instructions to transparently, accurately, and helpfully explain the policy.</p> <p>Please do your best to serve the populations that are so helpful to the US, in so many tangible and intangible ways. Thank you- Erin</p> <p><b>Erin Hillis, PhD</b> (Dr. Hillis, Erin, she/her) <i>Associate Director of International Programs, PDSO</i> <i>Chair, LGBTQ Working Group</i> <i>Chair, NAFSA Region VII</i> Rhodes College Memphis, Tennessee <a href="mailto:hillise@rhodes.edu">hillise@rhodes.edu</a> (901) 843-3403</p>	<p><b>Response:</b></p> <p>USCIS is not making changes to the bridge application at this time. Guidance has been available on the USCIS website for many months and has not represented a policy change. See 8 CFR §§ 248.1(b) and 214.2(f) (5). See also Form I-539, Instructions for Application to Extend/Change Nonimmigrant Status, OMB No. 1615-0003, which state, in pertinent part:</p> <p>A change of status may be granted for a period up to 30 days before the report date or start date of the course of study listed on Form I-20. You must maintain your current, or other, nonimmigrant status up to 30 days before the report date or start date of the course of study listed on Form I-20 or your requested change of status may not be</p>

		<p>granted.</p> <p>We will consider these suggestions in a future revision.</p>
<p><b>Comment 2.</b></p>	<p><b>Commenter: Eowyn Greeno (received May 2, 2018)</b></p>	
	<p><b>I am writing to support the suggestions made by NAFSA in their April 12, 2018 letter, namely:</b></p> <ul style="list-style-type: none"> <li>o Abandon the burdensome, complicated, and expensive "bridge application" policy or revise Form I-539 and the Form Instructions to address the policy adequately</li> <li>o Clarify the instructions on change of status effective date</li> <li>o Clarify the use of Form I-539 when filed to extend M-1 stay in connection with a Form I-765 filed for M-1 practical training</li> <li>o Reference all D/S categories in the instructions, and specify that nonimmigrants with "D/S" should leave the expiration date field blank on the Form I-539</li> </ul> <p><b>Sincerely,</b></p> <p><b>Eowyn Greeno   Interim Director</b></p> <p><b>UNIVERSITY OF PUGET SOUND</b>  Office of International Programs  1500 N. Warner St. #1055  Tacoma, WA 98416-1055  T: +1.253.879.2513  E: <a href="mailto:egreeno@pugetsound.edu">egreeno@pugetsound.edu</a></p>	<p><b>Response:</b>  USCIS is not making changes to the bridge application at this time. Guidance has been available on the USCIS website for many months and has not represented a policy change. We will consider these suggestions in a future revision.</p> <p>USCIS appreciates your suggestions for clarifications to certain instructions, and this input can be considered in future revisions.</p>

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